

August 6, 2021

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Ulku Rowe v. Google LLC*, Case No. 1:19-cv-08655 (LGS)(GWG)

Your Honor:

The parties jointly submit this letter pursuant to the Court's June 21, 2021, Order [ECF 124]. The parties' settlement conference before Magistrate Judge Kevin N. Fox on July 29, 2021, was unsuccessful in resolving this case. Subsequently, the parties met and conferred in an effort to narrow the claims at issue. Based on the Court's representation during the May 27 conference that it would continue to exercise supplemental jurisdiction of the city and state claims, Plaintiff will dismiss her Title VII and the Equal Pay Act claims, *i.e.*, her first, second, third, and seventh causes of action as stated in her Second Amended Complaint [ECF 108], and the parties will file an appropriate stipulation. There has been no agreement on the appropriate scope of comparators for purposes of plaintiff's remaining gender discrimination and fair pay claims pursuant to local and state law, respectively. Accordingly, the parties intend to file motions for summary judgment as follows:

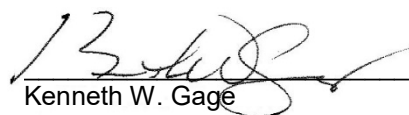
- Defendant intends to move for summary judgment on plaintiff's New York City Human Rights discrimination and retaliation claims (her fifth and sixth causes of action) and her New York Labor Law fair pay and retaliation claims (her fourth and eighth causes of action) for the reasons set forth in its pre-motion letter dated April 28, 2021 [ECF 113].
- Plaintiff intends to move for summary judgment on her New York Labor Law fair pay claim (her fourth cause of action) for the reasons set forth in her pre-motion letter dated April 28, 2021 [ECF 112].

The parties respectfully propose the following briefing schedule for the anticipated cross-motions. The proposed schedule allows for fully-briefed submissions before the end of the year, while also accounting for defense counsel's jury trials and arbitration hearings in other matters set for early September, late September, and mid-November, and plaintiff's counsel going out on medical leave until September 7.

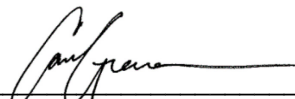
- October 29, 2021 – Deadline to submit cross-motions for summary judgment
- December 3, 2021 – Deadline to submit opposition briefs
- December 17, 2021 – Deadline to submit reply briefs

We thank the Court for its continued attention to this matter.

Respectfully submitted,



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